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Associate General Counsel

REDACTED – FOR PUBLIC INSPECTION

Via ECFS

October 5, 2016

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: *Comprehensive Review of the Part 32 Uniform System of Accounts*,
WC Docket No. 14-130

Dear Ms. Dortch:

CenturyLink, Inc.¹ hereby submits the enclosed spreadsheet, which it requests be placed in the record of the above-captioned proceeding. This spreadsheet includes granular balance sheet and income statement financial data for 2013 through 2015 for four of CenturyLink's operating affiliates – combined in a single document.

The spreadsheet is the confidential and proprietary commercial information of CenturyLink that is entitled to protection from public disclosure by the *Protective Order*² in the above-referenced docket, as described in the Confidentiality Appendix attached to this letter. Although the confidential and proprietary information in the spreadsheet is specifically protected from disclosure pursuant to the terms of the *Protective Order* in WC Docket No. 14-130, the Confidentiality Appendix attached to this correspondence provides separate justification for

¹ CenturyLink, Inc., and its operating affiliates on whose behalf today's filing is made, are collectively referred to herein as "CenturyLink".

² *Comprehensive Review of the Part 32 Uniform System of Accounts*, 31 FCC Rcd 3599 (2016) (*Protective Order*).

confidential treatment under FOIA³ and the Commission's implementing rules, 47 C.F.R. §§ 0.457, 0.459.

Given the confidential and proprietary nature of the financial information enclosed with this submission, the non-redacted version is marked, consistent with the *Protective Order*, as **“CONFIDENTIAL INFORMATION – SUBJECT TO PROTECTIVE ORDER IN WC DOCKET NO. 14-130 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION.”** This confidential and proprietary financial data is competitively sensitive commercial information that should not be available for public inspection and is appropriate for non-disclosure as its release would have a substantial negative competitive impact on CenturyLink.

Consistent with the *Protective Order*, CenturyLink is filing one hard copy of its non-redacted submission with the Office of the Secretary and providing two hard copies of its non-redacted submission to Robin Cohn of the Pricing Policy Division of the Wireline Competition Bureau.

CenturyLink is also filing today via the Commission's Electronic Comment Filing System (ECFS) a redacted version of its submission. Consistent with the *Protective Order*, the redacted version of CenturyLink's filing, in which the confidential information is omitted, is marked, **“REDACTED – FOR PUBLIC INSPECTION.”**

The text of this letter and the attached Confidentiality Appendix, which contain no confidential information, are the same for both the non-redacted and redacted versions except for the confidentiality markings and the manner of submission noted in the heading on the initial page.

Please contact the undersigned with any questions.

Sincerely,

/s/ Timothy M. Boucher

Enclosures

³ 5 U.S.C. § 552. See also *Protective Order*, 31 FCC Rcd at 3599 ¶ 2.

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CONFIDENTIALITY APPENDIX

47 C.F.R. § 0.457

Information included with CenturyLink's October 5, 2016 submission is entitled to confidential treatment under 47 C.F.R. § 0.457, and the April 15, 2016 *Protective Order* in WC Docket No. 14-130.

The type of confidential information being submitted includes granular balance sheet and income statement financial data for 2013 through 2015 for four of CenturyLink's operating affiliates – combined in a single document. This financial data is confidential and proprietary commercial information regarding CenturyLink's internal business operations that is not accessible via publicly available sources. This confidential and proprietary information also is not routinely available from CenturyLink nor is it available for public inspection from the Commission and thus is protected from public availability under 47 C.F.R. § 0.457(d).

47 C.F.R. § 0.459

CenturyLink also considers the confidential information being submitted as protected from public disclosure pursuant to 47 C.F.R. § 0.459(b) as described as follows.

Information for which confidential treatment is sought

CenturyLink seeks confidential treatment for information included with its October 5, 2016 submission in WC Docket No. 14-130, which contains highly sensitive financial and commercial information regarding CenturyLink's internal business operations that is protected from public disclosure and availability.

Commission proceeding in which the information was submitted

The October 5, 2016 submission is being filed in WC Docket No. 14-130, *Comprehensive Review of the Part 32 Uniform System of Accounts*.

Degree to which the information in question is commercial or financial, or contains a trade secret or is privileged

The confidential information included with CenturyLink's submission that it considers commercially sensitive and proprietary includes granular balance sheet and income statement financial data for 2013 through 2015 for four of CenturyLink's operating affiliates.

This information is highly sensitive commercial information regarding CenturyLink's business operations that is not accessible via publicly available sources. This confidential and proprietary commercial information also is not routinely available from CenturyLink nor is it available for

public inspection from the Commission and thus is protected from public availability under 47 C.F.R. § 0.457(d).

Degree to which the information concerns a service that is subject to competition; and manner in which disclosure of the information could result in substantial competitive harm

The type of confidential information included with CenturyLink's submission would generally not be subject to routine public inspection under the Commission's rules (47 C.F.R. § 0.457(d)), demonstrating that the Commission already anticipates that its release likely would produce competitive harm. The telecommunications services CenturyLink provides – including local exchange, long-distance, broadband Internet access, business data and video services – are all competitive. The release of this confidential and proprietary information would cause competitive harm by allowing competitors to become aware of sensitive financial and commercial information regarding CenturyLink's business and internal operations, and the competitive markets in which CenturyLink operates.

Measures taken to prevent unauthorized disclosure; and availability of the information to the public and extent of any previous disclosure of the information to third parties

CenturyLink has treated and treats the sensitive financial and commercial information disclosed in its October 5, 2016 submission as confidential and proprietary, and has protected it from public disclosure.

Justification of the period during which CenturyLink asserts that the material should not be available for public disclosure

At this time, CenturyLink cannot determine any date on which the sensitive financial and commercial information included with its submission should not be considered confidential and proprietary.

Other information that CenturyLink believes may be useful in assessing whether its request for confidentiality should be granted

Under applicable FCC and court rulings, the information in question should be withheld from public disclosure. Exemption 4 of the Freedom of Information Act shields information that is (1) commercial or financial in nature; (2) obtained from a person outside government; and (3) privileged or confidential. The information in question satisfies this test.